

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-2(c)

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In Re:

Case No.: 13-35461

Betsy Baum and Helmuth M. Baum,

Debtor(s).

Hearing Date: September 14, 2016

Chapter: 13

Judge: Hon. Kathryn C. Ferguson

Opposition to Nissan Motor Acceptance Corporation for
Relief from Automatic Stay

The debtors, Betsy Baum and Hemluth M. Baum (“Debtors”), respectfully object to the Motion for Relief from Stay filed by Nissan Motor Credit Acceptance Corporation (“Creditor”).

In support thereof, Debtors submit the following:

1. On or around August 16, 2016. Nissan Motor Credit Acceptance Corporation filed a motion for relief from the automatic stay.
2. Creditor states that the lease on the 2013 Nissan Pathfinder has expired therefore it is seeking for relief so they may reposes the vehicle.
3. Debtors have made all payments on the lease as required. Debtors fell behind on payments briefly last year, but promptly cured. During the lease they had no other issues.
4. Debtors live in Matawan, NJ, which is not pedestrian friendly and has limited options for transportation. Debtors have another vehicle, but are currently both employed and

both commute to work. The Debtors also have two children. One in high school and the other in elementary school. A second vehicle is necessary for the well-being of the family.

5. Debtors have been trying to obtain a new vehicle but are currently unable to finance or lease a new vehicle due to the bankruptcy filing and do not have cash on hand to purchase a vehicle.

6. Debtors are willing to continue making payments to Nissan Motor Credit Acceptance Corp.

WHEREFORE, for all the foregoing reasons, the Debtors respectfully request that the Motion for Relief from Stay be denied and grant the Debtors such other and further relief as this Court deems appropriate.

Dated: Union City, NJ
September 7, 2016

/s/ Jenee K. Ciccarelli
By: Jenee K. Ciccarelli, Esq.
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